

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA * DOCKET NO. 17-CR-93

VERSUS *

**MARCUS ETIENNE AND * JUDGE WILLIAM ALSUP
ELIZABETH GOBERT**

DEFENDANT'S REQUEST FOR DISCOVERY

ELIZABETH GOBERT, defendant herein, hereby requests that the United States disclose all matters listed below:

- 1) Any relevant written or recorded statements made by defendant.
- 2) That portion of any written record containing the substance of any relevant oral statement made by the defendant.
- 3) Recorded grand jury testimony of the defendant relating to the offenses charged.
- 4) The substance of any other relevant oral statement made by the defendant whether before or after arrest in response to interrogation by any person then known by the defendant to be a government agent if the government intends to use the statement at trial.
- 5) The arrest and conviction record of defendant and Mr. Etienne.
- 6) The general nature of any Rule 404(b) evidence, the content and specific nature of the evidence, to which defendant the evidence relates, and the purpose for which the evidence will be offered at trial.

Respectfully submitted:

DORAN & CAWTHORNE, P.L.L.C.

/s/ Pride J. Doran, #25035

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system this 10th day of April, 2017.

/s/ Pride J. Doran